



## PA WIP8 Results - RESPONSE NEEDED

Jon Capacasa

to:

'Hines, John', 'Zemba, Andrew'

12/11/2010 08:09 AM

Cc:

cbrosch, jsweeney, Kelly Shenk, Mark Dubin, Sucharith Ravi, Katherine Antos, Suzanne Hall, "Pattison, Kenn", "Pat Buckley", Ann Roda, Chuck Fox

Bcc:

Lucinda Power

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Bcc: Lucinda Power/DC/USEPA/US

John/Andy - as promised, I am transmitting the latest Scenario Builder results of the PA WIP8 input deck that you submitted to us on the afternoon of Dec 9. The load spreadsheets and detailed run information are posted on the FTP site as noted below.

Bottom line - we still have an 8 percent gap in P loading state-wide and the Susquehanna Basin has a more pronounced imbalance (13%). We've run out of time for more scenario runs so will need your response to the options presented below as soon as possible. Getting the P numbers much closer to the mark will allow us to do NPS adjustments down to the allocation.

**SUMMARY**

Statewide, Pennsylvania's loads are 1.6% below the nitrogen allocation (PAWIP8 is 75.6 mpy compared to PA's allocation of 76.8 mpy) and 7.6% below the high end of the sediment allocation range. However, phosphorus is 8.7% above the phosphorus allocation (PAWIP8 is 3.0 mpy TP, compared to the statewide TP allocation of 2.7 mpy).

In the Susquehanna Basin, the phosphorus gap is more pronounced: PAWIP8 TP is 0.31 mpy, or 13.62%, over the Susquehanna allocation of 2.31 mpy. Given that nitrogen is 0.9% below the Susquehanna TN allocation, one option for the Commonwealth to consider is making a formal request to EPA to shift a portion of its TN allocation to TP at a 5:1 ratio. [Specifically, PA could request a shift of 946,399 mpy TN, which would lower the TN

allocation in the Susquehanna to 70,798,360 lbs and increase the TP allocation to 2,494,645 lbs]. EPA would then close any remaining gap in TP (and now a 0.4% gap in TN) by reducing NPS agriculture and urban per our discussion on Friday afternoon.

In all other PA basins, PAWIP8 TN, TP and TSED loads are below their allocations.

Also per our discussion on Friday afternoon, please let us know if you wish to request that EPA shift 50% of the AFO loads to the WLA and assume these AFOs in the WLA have 100% livestock and poultry waste management, barnyard runoff control, mortality composting, and poultry, swine and dairy feed management. These practices are already included in your WIP input deck; many of which are already at 100%. So it would not be a change from your baseline WIP.

Please let us whether PA requests that EPA pursue the option noted above and if you have any questions.  
Thanks - Jon

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**PA WIP 8 Results are now posted on the FTP site as noted below;**

1) Loads for PA WIP#8(2010PAWIP8N120910) are up in ftp at  
[ftp://ftp.chesapeakebay.net/Modeling/phase5/Phase53\\_Loads-Acres-BMPs/PA/](ftp://ftp.chesapeakebay.net/Modeling/phase5/Phase53_Loads-Acres-BMPs/PA/PA_Loads-Goals_2009-Comp-WIPs234_4(ReRun)_5678_EPAPA_121010.xls)  
Filename: PA\_Loads-Goals\_2009-Comp-WIPs234\_4(ReRun)\_5678\_EPAPA\_121010.xls

2) And on sharepoint at  
["http://sharepoint.chesapeakebay.net/sites/WIPResults/Shared%20Documents/Forms/AllItems.aspx"](http://sharepoint.chesapeakebay.net/sites/WIPResults/Shared%20Documents/Forms/AllItems.aspx)  
Filename: PA\_Loads-Goals\_2009-Comp-WIPs234\_4(ReRun)\_5678\_EPAPA\_121010.xls

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